



## **Emmanuel Bible College Accommodation and Accessibility of Service Policy**

**June 16, 2016**

**Accessible Customer Service Policy  
Required for the Implementation of the  
Accessibility for Ontarians with Disabilities Act  
(AODA 2005)**

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# Accommodation and Accessibility of Service Policy

## **1. Purpose / Background Information**

Emmanuel Bible College desires at all times to provide its services in a way that respects the dignity and independence of people with disabilities. We are all made “in the image of God.” (Genesis 1:27)

The Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”) is a Provincial Act with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

Under the AODA, Ontario Regulation 429/07 entitled “Accessibility Standards for Customer Service” came into force on January 1, 2008. That Regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or other third parties.

This policy is drafted in accordance with the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and addresses the following:

- the provision of goods and services to persons with disabilities;
- the use of assistive devices by persons with disabilities;
- the use of service animals by persons with disabilities;
- the use of support persons by persons with disabilities;
- notice of temporary disruptions in services and facilities;
- training;
- customer feedback regarding the provision of goods and services to persons with disabilities;
- and
- notice of availability and format of documents.

## **2. Application**

This policy applies to all persons who deal with members of the public or other third parties on behalf of Emmanuel Bible College, whether the person does so as an employee, member of the Board, agent, volunteer, or otherwise and all persons who participate in developing the College’s policies, practices and procedures governing the provision of goods and services to members of the public or other third parties.

## **3. Key Principles**

To effectively serve its students and all who use its services, Emmanuel Bible College will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- a. Dignity: Recognize all persons for their value and treat them with respect.
- b. Independence: Provide maximum autonomy to people with disabilities, while respecting their right to privacy and security.
- c. Responsiveness: Identify and address the needs of service users, including those with disabilities, through service policies that respect and value the input and experiences of all service users.

- d. **Integration:** Allowing people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. (Sometimes, integration does not serve the needs of all people with disabilities. In the case of services, it means that people with disabilities have the same opportunity to benefit from the manner of provision as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or more inconvenience.)
- e. **Accessibility:** Working toward making services and their delivery methods accessible to all users, removing both physical and attitudinal barriers for people with disabilities.
- f. **Sensitivity:** Ensuring that employees and other service providers are aware of and understand the needs of people with disabilities so that they can be sensitive and civil in their communications with all customers.
- g. **Review and Improvements:** Developing a system of regular review of practices and policies and ensuring that there is organizational commitment to implement practices that address the needs of all people.

#### 4. **Definitions**

- a. **Assistive device:** Auxiliary aid such as communication aid, cognition aid, personal mobility aid, and medical aid (e.g. cane, crutches, wheelchair, hearing aid).
- b. **Person with disabilities:** Individual with a disability as defined under the *Ontario Human Rights Code*. The *Accessibility for Ontarians with Disabilities Act, 2005* definition includes:
  - i. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
  - ii. a condition of mental impairment or a developmental disability,
  - iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
  - iv. a mental disorder, or
  - v. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*; ("handicap")
- c. **Service animal:** Any animal that is used by a person with a disability for reasons relating to his or her disability.
- d. **Support person:** Any person, whether a paid professional, volunteer, family member, or friend who accompanies a person with a disability in order to help with communication, personal care or medical needs, or access to goods or services.

## **5. Communication and Documentation**

- a. When communicating with a person with a disability, employees will do so in a manner that takes into account the person's disability. Staff will be trained to communicate over the telephone in clear and plain language and to speak clearly.
- b. We will offer to use other modes of communication available to both our staff and to those we are communicating with. At this time the College does not possess TTY capabilities but is able to offer communication by email.
- c. When providing a copy of a document to a person with a disability Emmanuel will strive to give the person the document, or the information contained in the document, in a format that takes into account the person's disability.

## **6. Assistive Devices**

- a. Emmanuel Bible College permits service users with disabilities to use their own personal assistive devices providing the assistive device does not jeopardize or interfere with the integrity, assets of the organization and safety of other individuals.
- b. It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.
- c. The College may offer a person with a disability other reasonable measures to assist the person in obtaining and using and services. Where such assisted serviced is provided, these must be documented in policies and procedures.

## **7. Service Animals**

- a. A person with a disability may enter Emmanuel Bible College premises accompanied by their guide dog or service animal in areas of the premises that are open to the public and, if a student then to areas open for students, unless the animal is excluded by another law or for safety considerations. If a service animal is excluded by law or for safety considerations, other measures to provide service to the person with a disability may be used.
- b. The College may ask the person with a disability for a letter from a regulated health professional confirming that the person requires the animal for reasons relating to his or her disability. The College may also, or instead, ask for a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.
- c. It should be noted that it is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

## **8. Support Persons**

- a. A person with a disability may enter premises owned and operated, or operated, by the College with a support person and have access to the support person while on the premises.
- b. The College may require a person with a disability to be accompanied by a support person while on College premises. Before making a decision the College will:

1. consult with the person with a disability to understand their needs;
  2. consider health or safety reasons based on available evidence;
  3. determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.
- c. A support person, when assisting a person with a disability to obtain, use or benefit from the College's classes or educational offerings, will be permitted to attend those classes or educational offerings at no charge where tuition or a fee is applicable.

## **9. Notice of Disruption in Service**

- a. The College will make reasonable efforts to provide notice to students and other users of Emmanuel services, when possible, if services are unavailable.
- b. When a disruption occurs unexpectedly, notice shall conspicuously be posted as soon as possible.

## **10. Accommodation and Academics**

- a. A student or applicant who requires accommodation MUST disclose the need for accommodation **prior** to enrolling in a Program. Specific policies related to academic accommodations are being compiled in a separate policy document entitled *Academic Accommodation Policies for Students with Disabilities*. This document is due to be completed by June 30, 2013.
- b. Where possible, Emmanuel Bible College will seek to provide educational accommodations within reasonable limits and statutory requirements. Prospective students requiring specialized equipment are advised that external funding sources may assist them with procuring such equipment. More detailed information on this may be obtained from the College. Those who wish to obtain information on the way Emmanuel Bible College provides academic accommodation to people with disabilities can make a verbal request, send a written communication to the College in care of Student Services, Emmanuel Bible College, 100 Fergus Avenue, Kitchener, ON, N2A 2H2, call 519-894-8900, or email Student Services in care of [info@emmanuelbiblecollege.ca](mailto:info@emmanuelbiblecollege.ca). Individuals can expect to hear back within 30 days.

## **11. Feedback**

- a. The College will acknowledge feedback in a timely manner that takes into account the customer's disability.
- b. The College will capture and track feedback. Those who wish to provide feedback on the way Emmanuel Bible College provides services to people with disabilities can verbally inform, send a written communication to the College in care of Human Resources, Emmanuel Bible College, 100 Fergus Avenue, Kitchener, ON, N2A 2H2, call Reception at 519-894-8900, or email [admin@emmanuelbiblecollege.ca](mailto:admin@emmanuelbiblecollege.ca). If necessary, different accessible formats and communication supports for feedback can be arranged upon request. Individuals can expect to hear back within 30 days.
- c. Complaints may be addressed to the Office of the President.

## 12. Training

- a. All persons to whom this policy applies will receive training as required by the Accessibility Standards for Customer Service, including employees, contractors, third parties and volunteers.

Individuals in the following positions will be trained:

- All academic staff including instructors
  - All office and bookkeeping staff and regular volunteers
  - All maintenance and cleaning staff
  - All admissions staff and regular volunteers
  - All student services staff and regular volunteers
  - All development staff and regular volunteers
- b. For all staff and volunteers, training will normally be done through guided reading followed by a review with a trained supervisor. An annual review of policy will be carried out during the course of the normal schedule of staff meetings.
- c. Training will include:
- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
  - This service plan.
  - How to interact and communicate with people with various types of disabilities
  - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
  - Awareness of, and how to use any equipment or devices available on-site that may help with providing goods or services to people with disabilities;
  - What to do if a person with a disability is having difficulty in accessing Emmanuel Bible College's services.
- d. When changes are made to this policy or to the annual accessibility review and planning document, staff will be trained during the course of a regular staff meeting.
- e. Records of training will be kept by the Office of the President, including the dates that training was provided and the individuals who received the training.
- f. Training information will be available to service users upon request while maintaining personnel privacy considerations.

## 13. Annual Review of Accessibility Plan

- a. This policy document will be reviewed on an annual basis by a committee of executive staff.
- b. Emmanuel will create an *annual accessibility review and planning document* that will be developed through consultation with each department and through review of: feedback received, best practices, and relevant legislation. Responsibility for the creation of this plan will lie with Human Resources and the Office of the President.
- c. The purpose of the planning document will be to guide Emmanuel's development toward full accessibility. The planning document shall be prepared in advance of formulation of the institutional annual budget for the succeeding year.

#### **14. Availability of Emmanuel Bible College Accessibility Policy and Planning Documents**

Public access to this document and the annual Accessibility Plan will be available in the following ways:

- On the College website at <http://emmanuelbiblecollege.ca/about/accessibility>
- Upon written request to Human Resources, Emmanuel Bible College, 100 Fergus Avenue, Kitchener, ON, N2A 2H2
- Calling Reception at 519-894-8900
- Emailing [admin@emmanuelbiblecollege.ca](mailto:admin@emmanuelbiblecollege.ca).